

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

***Investigation by the Department into Boston Gas Company's  
2002 Service Quality Report, filed pursuant to Service  
Quality Standards for Electric Distribution Companies and  
Local Gas Distribution Companies***

D.T.E. 03-14

**ATTORNEY GENERAL'S FIRST SET OF  
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General's First Set of Information Requests in the above captioned proceeding.

**INSTRUCTIONS**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Gas Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.

5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. The term "Company" refers to Boston Gas Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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D.T.E. 03-14

**THE FIRST SET OF INFORMATION REQUESTS  
OF THE ATTORNEY GENERAL**

AG-1-1      Please provide the following information for the Company's Telephone  
Answering Factor Percentage:

- (1)      the raw data underlying the measurements;
- (2)      the additions, reductions, corrections, or any other adjustments made to the  
raw data and the assumptions used to determine the final measurements;  
and
- (3)      a complete and detailed description of the reasons the Company made each  
additions, reductions, corrections, or any other adjustments made to the  
raw data and the assumptions used to determine the final measurements.

AG-1-2      Please provide the following information for the Company's Emergency  
Answering Percentage category:

- (1)      the raw data underlying the measurements;
- (2)      the additions, reductions, corrections, or any other adjustments made to the  
raw data and the assumptions used to determine the final measurements;  
and
- (3)      a complete and detailed description of the reasons the Company made each  
additions, reductions, corrections, or any other adjustments made to the  
raw data and the assumptions used to determine the final measurements.

- AG-1-3 Please provide the following information for the Company's Service Appointments Kept Percentage category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements; and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.
- AG-1-4 Please provide the following information for the Company's Meter Reads Percentage category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements; and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.
- AG-1-5 Please provide the following information for the Company's Consumer Division Cases category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements; and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.
- AG-1-6 Please provide the following information for the Company's Bill Adjustments category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements; and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.

- AG-1-7 Please provide the following information for the Company's Lost Accident Rate category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements;  
and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.
- AG-1-8 Please provide the following information for the Company's Response To Odor Calls Percentage category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements;  
and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.
- AG-1-9 Please provide the following information for the Company's Customer Surveys – Random category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements;  
and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.
- AG-1-10 Please provide the following information for the Company's Customer Surveys – Calls category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements;  
and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.

- AG-1-11 Please provide the following information for the Company's Customer Service Guarantees category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements; and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.
- AG-1-12 Please provide the following information for the Company's Unaccounted For Gas category:
- (1) the raw data underlying the measurements;
  - (2) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements; and
  - (3) a complete and detailed description of the reasons the Company made each additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.
- AG-1-13 Please provide all of the raw data and adjustments for each of the Company's service quality categories in an Excel or Lotus spreadsheet format on a 3" diskette.
- AG-1-14 Please provide a complete copy of the Company's final service quality benchmark plan which includes the benchmarks for 2002, along with all corrections, amendments, and supplements. Include all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions supporting the service quality measures and any penalties incurred. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 spreadsheets.
- AG-1-15 Please explain any and all computational or methodological differences in the methods used to collect and compile data and the actual data used in developing the service quality standards included in this Service Quality Plan and those used in developing the standards included in the Company's final service quality benchmark plan which includes the benchmarks for 2002. Include an explanation for the differences and why one method or data source or period was used in one and not another. This response should address explicitly the differences in the historical reliability data.

- AG-1-16 Referring to the Company's capital spending forecast / actual, please breakdown the Company's replacement of mains for each year by material type (cast iron, steel, plastic, etc.).
- AG-1-17 Referring to the Company's capital spending forecast / actual, please breakdown the Company's replacement of services for each year by material type (cast iron, steel, plastic, etc.).
- AG-1-18 Please provide a complete copy of the Company's original cast iron replacement program that is being used to meet its requirements under the Department's regulations in 220 C.M.R. 113.05.
- AG-1-19 Please provide an annual comparison of the actual historical cast iron replacement to the Company's annual amounts required under the Department's regulations in 220 C.M.R. 113.05, since the inception of the program.
- AG-1-20 Please provide itemize and quantify the amounts of mains and services as of December 31, 2002 that still need to be replaced by the Company to meet its requirements under the Department's regulations in 220 C.M.R. 113.05.

DATED: March 27, 2003.